

P.C. 8400204

**From:** David <bayareaipa@yahoo.com>  
**To:** <wvogl@samhsa.gov>  
**Date:** 7/8/04 4:38PM  
**Subject:** Revised Mandatory Guidelines FR DOCKET 04-7984

Dear Sir/Madam:

Please re-consider the provisions contained in the above guidelines. I am a paruretic, which means I suffer from "shy bladder syndrome". This is a real medical disorder, and means that the bladder and sphincter muscles can shut down completely when under stress, even when the bladder is uncomfortably full. An example of stress is being asked to provide a urine sample under visual observation, possibly by a tester of the opposite gender. Another example of stress is being treated with disdain for not providing a sample immediately and being repeatedly asked to hurry up. Yet another example is a tester announcing loudly "Here's another one - I guess everybody else is going to have to wait until he can give us a sample". You get the picture.

I object to the rules that equate the inability to produce a specimen with refusal to be tested. These rules are unjust for that reason, as well as the fact that no other means of testing is accepted at present (whether by the drug testing company or by independent laboratories). SAMHSA needs to mandate immediately the use of these alternative tests: oral fluid, hair or sweat patches. In general, these methods are more reliable than urine testing and in the case of hair samples, also indicate possible drug use over the long term.

These alternative means of drug testing should apply for anyone who requests these, but particularly for those who state they suffer from shy bladder. Through discrimination (by improperly and perhaps illegally implementing urine testing), present rules hurt my ability to obtain and keep a job. There are others who have lost their job as a result of urine testing carried out in a crude and insensitive manner; alleged drug use was never proven.

Thank you for your consideration.

Yours sincerely,  
David Bowles

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